To: Weber, Rebecca[Weber.Rebecca@epa.gov]

Cc: Jay, Michael[Jay.Michael@epa.gov]

From: Bryan, David

Sent: Mon 6/27/2016 11:41:03 AM

Subject: RE: Columbia Missourian - Labadie Environmental Group Awaits Ruling From EPA on Ameren

Emissions

Mike – Let's talk. Teleworking today and out from 9-10:30 a.m.

dwb

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From: Weber, Rebecca

Sent: Monday, June 27, 2016 6:40 AM

To: Bryan, David <Bryan.David@epa.gov>
Cc: Jay, Michael <Jay.Michael@epa.gov>

Subject: Re: Columbia Missourian - Labadie Environmental Group Awaits Ruling From EPA

on Ameren Emissions

We will need to be ready this week to respond on our decision

Sent from my iPhone

On Jun 27, 2016, at 6:21 AM, Bryan, David < Bryan. David@epa.gov > wrote:

FYI. We were never asked to be a part of this story - dwb

Labadie Environmental Group Awaits Ruling From EPA on Ameren Emissions

Posted: Saturday, June 25, 2016 6:32 pm

By Monte Miller

Columbia Missourian Staff Writer

The Labadie Environmental Group is anxiously awaiting the U.S. Environmental Protection Agency ruling on sulfur dioxide (SO2) emissions at the Ameren Missouri Labadie coal-fired power plant.

With the close of public comments June 28 and the EPA ruling set for July 2, the stakes are high for both Ameren, which says it's within compliance, and residents living near the power plant, who say the utility is polluting the area.

"Who knows what is going to happen," said Patricia Schuba, with the Labadie Environmental Organization (LEO). "I would much rather pay for electricity than cancer treatments."

The main issues at hand are the sulfur dioxide emissions at the plant that have come under scrutiny in the past and the ways in which they are monitored and the amount of data collected.

The EPA is required to make a final decision about SO2 air quality around the Labadie coal plant and was accepting recommendations from the state until fall of 2015. In September 2015, DNR made the recommendation to designate the area as unclassifiable.

"The air monitoring designation has to be made by the EPA," Schuba said. "Data must be collected for three years. These monitors were only put in place for three to six months."

Schuba said the data collected by the monitors was then put into projection models and failed the clear air act acceptable installments.

"The maximum acceptable exposure of sulfur dioxide is 75 parts per billion for a one-hour period," she said. "They showed exceedances in all instances."

Schuba claims the air-quality monitors were not in place for the correct amount of time, nor were they put in the correct locations.

"The monitors were not approved by the EPA," she said. "The monitor locations were not designed to capture the highest emissions and the local monitors did not collect sufficient and accurate data," she said.

Ameren Responds

Ameren says the modeling is not a proper way to measure the air quality and its data shows the SO2 output is 90 percent below allowable levels per hour.

"I firmly believe the best way to accurately measure the amount of SO2 is through proper air monitoring," said Steve Whitworth, Ameren senior director of environmental policy and analysis.

"Other groups are relying solely on modeling, and how can you accurately predict the outcome of a model?" he asked.

Whitworth added Ameren has installed air monitors at various places on or around the Labadie plant, including the smokestacks in April of 2015.

"Data we have collected over the past eight months is well below the allowable standard," he explained. "All of their decisions have been based on modeling." Whitworth said Ameren's "monitoring data is the weight of the evidence." Results The Labadie Ameren plant was built in 1972 and is one of the largest coal-burning power plants in the state and one of the only without scrubbers. If the EPA does rule against Ameren, and its emissions are too high, there are several steps that must then be followed at the plant to lower the overall emissions, according to Ken Miller, an environmental scientist at the Washington University Interdisciplinary Environmental Clinic. "First a State Implementation Plan (SIP) will have to be drafted and that could take up to 18 months," he said. "Who knows what that plan might say needs to be done." Miller said the best, but most costly, solution for reducing the SO2 emission would be to install wet scrubbers at the Labadie plant. "A wet scrubber would eliminate 98 to 99 percent of the emissions," he said. "But, they come with a price tag of \$500 to \$600 million dollars and would require practically an entire rebuild of the smokestacks and reconfiguration of the Labadie plant." Other options would include installation of dry scrubbers, which are less expensive and would capture 90 percent of emissions. A process called dry sorbent injection would eliminate 60 percent of emissions. Miller noted Ameren has announced plans to operate the Labadie plant until the year 2042, and to install the costly scrubbers and replace the stacks could be a two-to three-year process.